

JS 44 (Rev. 10/20)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I (a) PLAINTIFFS

Lisa Cleveland and Robert Broncel

(b) County of Residence of First Listed Plaintiff Essex
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

DEFENDANTS

Ret Judge Donald A. Kessler, Essex County, New Jersey

JP Morgan Chase, Deutsche Bank, SP Servicing

County of Residence of First Listed Defendant Essex

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input checked="" type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	

V. ORIGIN (Place an "X" in One Box Only)

- ☐ Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Recopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

42 USC Section 1983

Brief description of cause:

We seek quiet title for our former property.

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND:

☒ Yes ☐ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

Lisa M. Adubato

DOCKET NUMBER

ESX-DC-011070-20

DATE

January 12, 2021

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

Lisa S Cleveland and Robert Broncel

(In the space above enter the full name(s) of the plaintiff(s).)

- against -

Ret Judge Donald A Kessler

Essex County, NJ

JP Morgan Chase

SP Servicing

Deutsche Bank

COMPLAINT

Jury Trial: ☒ Yes ☐ No

(check one)

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

I. Parties in this complaint:

- A. List your name, address and telephone number. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff	Name	Lisa Cleveland and Robert Broncel
	Street Address	150 Montrose Avenue c/o PO Box 202, Maplewood NJ 07040
	County, City	Essex County, South Orange
	State & Zip Code	NJ 07079-2415
	Telephone Number	973-902-5415

- B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1	Name <u>See Attached</u>
	Street Address _____
	County, City _____
	State & Zip Code _____
Defendant No. 2	Name _____
	Street Address _____
	County, City _____
	State & Zip Code _____
Defendant No. 3	Name _____
	Street Address _____
	County, City _____
	State & Zip Code _____
Defendant No. 4	Name _____
	Street Address _____
	County, City _____
	State & Zip Code _____

II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. There are four types of cases that can be heard in federal court: 1) Federal Question - Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case; 2) Diversity of Citizenship - Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case; 3) U.S. Government Plaintiff; and 4) U.S. Government Defendant.

- A. What is the basis for federal court jurisdiction? (*check all that apply*)



Federal Questions



Diversity of Citizenship



U.S. Government Plaintiff



U.S. Government Defendant

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? _____
- _____
- _____

Defendant No. 1

Name	Jason Miller, Esq.
Job or Title <i>(if known)</i>	General Counsel - SP Servicing
Street Address	P.O. Box 65277
City and County	Salt Lake City in Salt Lake County
State and Zip Code	Utah 84165-0277
Telephone Number	1-801-293-3936
E-mail Address <i>(if known)</i>	

Defendant No. 2

Name	Stacey Friedman, Esq.
Job or Title <i>(if known)</i>	General Counsel - JP Morgan Chase
Street Address	383 Madison Ave
City and County	New York in New York County
State and Zip Code	NY 10017
Telephone Number	(212) 270-6000
E-mail Address <i>(if known)</i>	executive.office@chase.com; stacey.friedman@jpmorgan.com

Defendant No. 3

Name	Donald A. Kessler
Job or Title <i>(if known)</i>	Retired Judge, c/o Chris Durkin, Clerk of Essex County
Street Address	465 Dr Martin Luther King Jr Blvd
City and County	Newark in Essex County
State and Zip Code	NJ 07102
Telephone Number	973-621-4921
E-mail Address <i>(if known)</i>	

Defendant No. 4

Name	Essex County, New Jersey
Job or Title <i>(if known)</i>	County, c/o Chris Durkin, Clerk of Essex County
Street Address	465 Dr Martin Luther King Jr Blvd
City and County	Newark in Essex County
State and Zip Code	NJ 07102
Telephone Number	973-621-4921
E-mail Address <i>(if known)</i>	

Defendant No. 5

Name	<u>Joseph Salama</u>
Job or Title (<i>if known</i>)	<u>General Counsel of the Americas</u>
Street Address	<u>60 Wall Street</u>
City and County	<u>New York, New York County</u>
State and Zip Code	<u>NY 10005</u>
Telephone Number	<u>212-250-9536</u>
E-mail Address (<i>if known</i>)	

Defendant No. 6

Name	<u>Robbie Harrington – American Security</u>
Job or Title (<i>if known</i>)	<u>Insurance Company, General Counsel</u>
Street Address	<u>260 Interstate North Circle SE</u>
City and County	<u>Atlanta</u>
State and Zip Code	<u>Georgia 30339-2210</u>
Telephone Number	<u>212-250-9536</u>
E-mail Address (<i>if known</i>)	

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship _____

Defendant(s) state(s) of citizenship _____

III. Statement of Claim: See attached.

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? _____

B. What date and approximate time did the events giving rise to your claim(s) occur? _____

C. Facts: _____

What
happened
to you?

Who did
what?

Was
anyone
else
involved?

Who else
saw what
happened?

IV. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received. _____

V. Relief: *See attached.*

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.

- C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

My home was sold during a Sheriff's sale, after an arduous fight with all of the above named parties. The sale is predicated on two faulty assignments from JP Morgan Chase. I was never given the opportunity by the Judge, nor any of the involved parties to be heard, as the Judge rejected my claims and entered a Default Judgment. The Judge is a resident of my town and the look of impropriety where a Judge adjudicates a matter that potentially impacts him personally is palpable. My husband Robert Broncel is also fully aware of all of the facts.

IV. Irreparable Injury

Explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

The loss of the home where my husband and I raised our three bi-racial children, because of the continued abuses in the Essex County Court System, along with the practices of a Predatory Lender, and a corrupt Servicer should not go unchallenged. These are problems that continue to plague hardworking women of color. The house and the land on which it sits is unique and therefore irreplaceable. It is my right to have the liberty to

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

I would like the Court to a) stop the Predatory behavior enumerated herein of SP Servicing, Deutsche Bank, JP Morgan Chase and set an example for local Judiciary within the State Courts for their willing complicity; b) I beseech the Court to set aside the Default Judgment so that the evidence can be heard, and my due Process be granted and restored; and c) extend my right to remain in our current residence until two months after the pandemic has been declared over by Governor Tom Murphy, or the Federal Moratorium has been lifted, or this matter is decided, whichever is later and d) award us \$2 million, which represents the \$1.7 million that I owed SP Servicing at the time of the sale + Attorneys Fee equivalency for me representing my families interests from the time that we could no longer afford an attorney. This will allow me to compensate the buyer by returning his money and expenses in terms of real estate taxes, as well as move forward with our lives.

→ The final Judge - Judge Paganelli was the only person that carefully examined my evidence & understood my point, but I had mistakenly made a Motion for Reconsideration before Judge Kessler ~~in~~ before of the Paganelli Motion should have been before the Appellate Division. Navigating this Judicial maze as a Pro-Se Defendant has not been easy. Unclear if the due to the machinations of ~~the~~ JPM.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 12 day of January, 20 21.

Signature of Plaintiff

Mailing Address

[Signature]
P.O. Box 202
Maplewood NJ 07040

Telephone Number

973-902-5415

Fax Number (if you have one)

973-218-8400

E-mail Address

Lisa SCleveland@gmail.com

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint.

Signature of Plaintiff:

[Signature]